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ATTORNEYS FOR
DEFENDANT NETFLIX, INC.

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 BROADCOM CORPORATION *et al.*,

20 Plaintiffs,

21 v.

22 NETFLIX, INC.,

23 Defendant.

Case No. 3:20-cv-04677-JD

**JOINT STIPULATION TO MODIFY
CERTAIN DEADLINES AND
[PROPOSED] ORDER**

Dept.: Courtroom 11, 19th Floor
Judge: Honorable James Donato

Date Filed: March 13, 2020

Trial Date: January 27, 2025

1 Pursuant to Local Rules 6-2 and 7-12, Plaintiffs Broadcom Corporation and Avago
 2 Technologies International Sales PTE. Limited (“Broadcom”) and Defendant Netflix, Inc.
 3 (“Netflix”) (collectively, the “Parties”), by and through their respective counsel, hereby stipulate
 4 and request as follows:

5 **SHOWING OF GOOD CAUSE**

6 WHEREAS, the current Court-ordered schedule sets January 9, 2025, as the date of the
 7 Pretrial Conference;

8 WHEREAS, under the Court’s Standing Order for Civil Jury Trials, the deadline for
 9 submitting the pretrial filings is 14 days before the Pretrial Conference;

10 WHEREAS, 14 days before the January 9, 2025, Pretrial Conference is December 26,
 11 2024—the day after Christmas;

12 WHEREAS, the Parties have agreed to move forward the date for submitting the pretrial
 13 filings to December 13, 2024;

14 WHEREAS, under the Court’s Standing Order, the deadline for lead trial counsel to meet
 15 and confer regarding the pretrial filings is November 26, 2024;

16 WHEREAS, the Parties have agreed to move forward the deadline for lead counsel to
 17 meet and confer regarding the pretrial filings to October 22, 2024;

18 WHEREAS, the Parties have agreed among themselves to various deadlines for
 19 exchanging drafts of certain pretrial filings; and

20 WHEREAS, the Court’s Scheduling Order will otherwise remain unchanged;

21 NOW THEREFORE, the Parties respectfully request that this Court order the following
 22 modification to the Scheduling Order:

Event	Current Deadline	Proposed Deadline
Lead trial counsel to meet and confer re: preparation of joint pretrial materials	November 26, 2024	October 22, 2024

Event	Current Deadline	Proposed Deadline
Exchange of deposition and discovery response designations (not filed with the Court)	<i>None set</i>	November 1, 2024
Exchange counter-designations and objections to deposition and discovery-response designations (not filed with the Court)	<i>None set</i>	November 22, 2024
Exchange exhibits and exhibit lists (not filed with the Court)	<i>None set</i>	November 19, 2024
Exchange objections to exhibit lists (not filed with the Court)	<i>None set</i>	December 3, 2024
Exchange witness lists (not filed with the Court)	<i>None set</i>	November 15, 2024
Parties exchange motions <i>in limine</i> (not filed with the Court)	December 12, 2024	November 26, 2024
Parties exchange oppositions to motions <i>in limine</i> (not filed with the Court)	December 22, 2024	December 9, 2024
Pretrial filings	December 26, 2024	December 13, 2024
Pretrial conference	January 9, 2025, at 1:30 p.m.	<i>Unchanged</i>
Parties to file deposition and discovery designations, including counter-designations and objections	January 22, 2025	<i>Unchanged</i>
Jury Trial	January 27, 2025, at 9:00 a.m.	<i>Unchanged</i>

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
2

3 Dated: _____
4

5 HONORABLE JAMES DONATO
6 UNITES STATES DISTRICT JUDGE
7

8 KEKER, VAN NEST & PETERS LLP
9

10 */s/ Courtland L. Reichman*
11

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20 */s/ Sharif E. Jacob*
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ATTESTATION

In accordance with Civil Local Rule 5-1(h)(3), I attest that each of the signatories have concurred in the filing of this document.

Dated: October 10, 2024

By: /s/ *Courtland L. Reichman*
Courtland L. Reichman